

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
SCOTT W. WENTZEL	:	
CHRISTINE L. WENTZEL	:	
Debtors,	:	
	:	
v.	:	
	:	Bankruptcy No. 1:19-bk-04941-HWV
ACAR LEASING LTD DBA GM	:	
FINANCIAL LEASING	:	
Movant,	:	
	:	
SCOTT W. WENTZEL	:	
CHRISTINE L. WENTZEL	:	
Respondents,	:	
	:	
CHARLES J. DEHART III	:	
Trustee	:	

**DEBTOR'S ANSWER TO MOVANT'S MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY AND REQUEST FOR SPECIAL RELIEF**

AND NOW COMES, Debtors, Scott W. Wentzel and Christine L. Wentzel, by and through their attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part and denied in part. It is admitted at the time of the filing of the motion that Debtors were behind on payments. It is denied that they are still behind. Debtors have made current the account through September 2020.
7. Denied.

8. Denied.

9. Admitted.

10. Admitted.

11. Paragraph 11 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

12. Paragraph 12 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

13. Paragraph 13 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

14. Paragraph 14 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

15. Paragraph 15 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

16. Paragraph 16 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

17. Paragraph 17 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

18. Paragraph 18 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

**WHEREFORE**, Debtors respectfully request that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS, & HARSHBERGER

Dated: September 1, 2020

s/Chad J. Julius  
ID# 209496  
8150 Derry Street  
Harrisburg, PA 17111.5260  
717.909.5858

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**CERTIFICATE OF SERVICE**

I, Colleen Reed, of Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within **Respondent's Answer to Movant's Motion For Relief From The Automatic Stay** upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) 8125 Adams Drive, Suite A Hummelstown, PA 17036	Martin A. Mooney, Esquire SCHILLER, KNAPP, LEFKOWITZ & HERTZEL, LLP 950 New Loudon Rd, Suite 109 Latham, New York 12110
United States Bankruptcy Court Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

s/ Colleen Reed  
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Dated: September 1, 2020